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quently cannot acquire a prescriptive title to the remainder. *Jeffries v. Butler*, 108 Ky. 531. But against any one causing actual damage to an expectant estate an action lies, and it suit is not brought within the statutory period, a prescriptive right may be acquired. See *Metropolitan Ass'n v. Petch*, 5 C. B. (N. S.) 504; *Heilborn v. Water Ditch Co.*, 75 Cal. 117. If the property is personally, the statutory period does not begin to run against a future interest in favor of a stranger in possession until the termination of the life interest, since until that time the owner of the future interest has no cause of action. *Clarkson v. Booth*, 17 Grat. (Va.) 490. In the present case, the action not being against an adverse possessor but against one who aided in the conversion of the entire property, the period of limitation is properly computed from the date of the act. It is impossible to select as the starting-point the termination of the life interest, because the conversion is an immediate wrong to the owner of the future interest. If the defendant is to be liable at all, the right of action must accrue at the time of the sale.

LIMITATION OF ACTIONS — NATURE AND CONSTRUCTION OF STATUTE — APPLICATION TO REVERSIONER OF STATUTE BARRING ACTION FOR PROPERTY SOLD BY ADMINISTRATOR. — The defendant went into possession of land under a conveyance of the dower interest of the deceased's widow. Later he bought in the reversion at a void administrator's sale. A statute provided that all actions for the recovery of property bought at an administrator's sale should be barred one year after the sale. *Held*, that the reversioner is barred one year after the death of the widow. *Jordan v. Bobbitt*, 45 So. 311 (Miss.).

Ordinarily a statute of limitations begins to run not from the time the acts complained of occurred, but from the time a cause of action became vested; for the wording of the statute usually necessitates such construction. *Andrews v. Hartford, etc., Co.*, 34 Conn. 57. In the present case the statute, by express provisions, is to run from the date of sale, and such statutes are usually strictly construed. *Jones v. Billstein*, 28 Wis. 221. But, as the court admits, it would be unreasonable to bar the plaintiff before his cause of action arose, and indeed such a construction would render the statute unconstitutional. See *Price v. Hopkin*, 13 Mich. 318. It would seem that inasmuch as the statute runs from the date of the sale, it was enacted to cut off within one year all causes of action then existing. But, since it cannot cut off the plaintiff's right at that time, it is a strained construction to make it run against him from the death of the life tenant. It would therefore seem that the general statute of limitations should apply. *Kessinger v. Wilson*, 53 Ark. 400.

MUNICIPAL CORPORATIONS — LIABILITY FOR TORTS — PERMITTING FIREWORKS IN STREET. — The defendant city issued a permit to a political club to give an exhibition of fireworks in the streets. At such an exhibition on a wide street, a mortar used for throwing bombs accidentally exploded, injuring the plaintiff, a voluntary spectator. *Held*, that the verdict and judgment for the defendant are affirmed, since the facts do not show a nuisance as a matter of law. *Melker v. City of New York*, 190 N. Y. 481.

This case confines an earlier New York decision, which held that the discharge of fireworks in the streets of a large city constituted a nuisance as a matter of law, to its particular facts. See *Speir v. City of Brooklyn*, 139 N. Y. 6. The present case is clearly right in holding that whether a given act is a nuisance depends upon all the circumstances under which the act is committed. The court, however, assumes, and it seems to be law in New York, that if this exhibition was a nuisance the defendant would necessarily be liable to any one who was hurt by it. *Landau v. City of New York*, 180 N. Y. 48. The only ground upon which the defendant can be held liable in this case is that it neglected its duty to use due care to keep its streets reasonably free from obstructions and nuisances. But in order to recover for negligence, the plaintiff must show that there was a duty owing to him. *O'Donnell v. Providence & Worcester Ry.*, 6 R. I. 211. It is at least doubtful if a city owes such a duty to persons who are present merely as spectators of the alleged nuisance and not